

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA,

VS.

JOSEPH CARAMADRE

and

RAYMOUR RADHAKRISHNAN

Defendants.

Criminal No. 11-186-S-DLM

**JOSEPH CARAMADRE’S OPPOSITION TO THE GOVERNMENT’S
MOTION TO DISQUALIFY COUNSEL**

Now comes Joseph Caramadre in opposition to the Government's Motion to Disqualify Counsel, who respectfully requests that this Honorable Court deny said motion. As reasons therefor, he relies upon the attached Memorandum of Law in Opposition to United States' Motion to Disqualify Counsel Based on Conflict of Interest.

WHEREFORE, for all of the reasons set forth in the attached Memorandum of Law, and the arguments of counsel at the hearing, the government's Motion to Disqualify Mr. Traini must be denied.

Respectfully submitted,
Joseph Caramadre, defendant
By His Attorneys,

/s/ Michael J. Lepizzera, Jr.
Michael J. Lepizzera, Jr. (#4995)
117 Metro Center Blvd. – Suite 2001
Warwick, RI 02886
Tel. (401) 739-7397
Fax (401) 691-3558
email: mlepizzera@leplap.com

/s/Anthony M. Traini

Anthony M. Traini (4793)
56 Pine Street – Suite 200
Providence, RI 02903-2819
Tel. 401.621.4700
Fax 401.621.5888
Email amt@atrainilaw.com

/s/ Thomas R. Kiley

Thomas R. Kiley, BBO No. 271460
William J. Cintolo, BBO No. 084120
COSGROVE EISENBERG & KILEY
One International Place, Suite 1820
Boston, MA 02110
Tel. 617.439.7775
Fax 617.330.8774
Email trkiley159@aol.com
Email wcintolo@aol.com

Dated: July 10, 2012

CERTIFICATION

I hereby certify that on the 10th day of July, 2012, I filed this document through the ECF system with notice to all parties listed therein.

/s/ Scott K. DeMello